

## REMARKS

Claims 9-12 have been cancelled. Thus, Claims 1-8 are currently pending in the present application, none of which has been amended.

### Rejection under 35 U.S.C. § 101

Claim 9 was rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. Applicants respectfully traverse such rejection.

Claim 9 has been cancelled. Thus, the § 101 rejection is deemed moot.

### Rejection under 35 U.S.C. § 112

Claim 9 was rejected under 35 U.S.C. § 112, first paragraph, for not complying with the enablement requirement. Applicants respectfully traverse such rejection.

Claim 9 has been cancelled. Thus, the § 112 rejection is deemed moot.

### Rejection under 35 U.S.C. § 102

Claims 1-2, 4-6, 8-10 and 12 were rejected under 35 U.S.C. § 102(b) as being anticipated by *Rostoker et al.* (US 5,557,531). Applicants respectfully traverse such rejection.

Claim 1 (and similarly Claim 5) recites "determining whether or not a simulation is required for said I/O circuit before performing I/O floor planning on said I/O circuit," and "in response to a determination that a simulation is required on said I/O circuit before performing I/O floor planning on said I/O circuit,

sending said collected design data to a simulation interface;

choosing an I/O behavioral model and a package model by said simulation interface based on said collected design data on said I/O circuit;

dynamically building a simulation deck by said simulation interface using said chosen models along with appropriate operating conditions; and

receiving simulation results by said simulation interface from a circuit simulator after a simulation had been performed by said circuit simulator using said simulation deck containing said chosen I/O behavioral model and said operating conditions."

Thus, according to the claimed invention, a determination is initially made as to whether or not a simulation is required for an I/O circuit before performing I/O floor planning on the I/O circuit. If a simulation is required, then the collected design data is sent to a simulation interface. Within the simulation interface, an I/O behavioral model and a package model are chosen "based on said collected design data on said I/O circuit," a simulation deck is dynamically built "using said chosen models along with appropriate operating conditions." A simulation is then performed using the "simulation deck containing said chosen I/O behavioral model and said operating conditions." The I/O floor planning is subsequently performed for the I/O circuit based on the received simulation results.

*Rostoker* does not teach or suggest the above-mentioned claimed steps. For example, on page 4 of the Final Office Action, the Examiner asserts that the claimed determining step is disclosed by *Rostoker* in col. 1, line 33 - col. 6, line 5 and in col. 7, line 55 - col. 15, line 27. Although the Examiner has cited almost half of the length of the reference to show one claimed step, the claimed determined step is still not disclosed in the cited passages as evidenced by the fact that none of Figures 2-9 and 18 discloses a decision step, much less the claimed determining step.

On page 4 of the Final Office Action, the Examiner again asserts that the same cited passage of *Rostoker* (i.e., col. 1, line 33 - col. 6, line 5 and in col. 7, line 55 - col. 15, line 27) disclose the claimed choosing step, the claimed building step and the claimed receiving step. Assuming *arguendo* that *Rostoker* may have disclosed one or more of the claimed choosing,

building and receiving steps in various portions of the above-cited passages, but *Rostoker* does not teach or suggest that the claimed choosing, building and receiving steps being performed together after determining that a simulation is required. As mentioned above, *Rostoker* does not teach or suggest such a determination step; thus, it is clear that even if *Rostoker* does disclose one or more of the claimed choosing, building and receiving steps, they are not performed "in response to a determination that a simulation is required on said I/O circuit before performing I/O floor planning on said I/O circuit," as claimed. Because the invention recites novel features that are taught or suggested by *Rostoker*, the § 102 rejection is believed to be overcome.

### CONCLUSION

Claims 1-8 are currently pending in the present application. For the reasons stated above, Applicants believe that independent Claims 1 and 5 along with their respective dependent claims are in condition for allowance.

No fee or extension of time is believed to be necessary; however, in the event that any addition fee or extension of time is required for the prosecution of the present application, please charge it against IBM Deposit Account No. 09-0456.

Respectfully submitted,



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Antony P. Ng  
*Registration No. 43,427*  
DILLON & YUDELL, LLP  
8911 N. Capital of Texas Hwy., suite 2110  
Austin, Texas 78759  
(512) 343-6116

ATTORNEY FOR APPLICANTS